



I-04823-0002

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COMMENT RESPONSE SUMMARY

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for the

*Five-Year Review (Type Ia) of the Surface Water Operable Unit
at the Paducah Gaseous Diffusion Plant, Paducah, Kentucky
(DOE/OR/07-1822&D0)*



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DE-AC05-98OR22700

Prepared for
Bechtel Jacobs Company LLC
Remediation Management Group

COMMENT RESPONSE SUMMARY
for Five-Year Review (Type Ia) of the Surface Water Operable Unit
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Comment Number	Sect. Page/Para.	Reviewer and Comment	Response
1.	Cover letter; Para. 2	<p>Bechtel Jacobs Company LLC/P. A. Gourieux [as transcribed by Debora Jolly]:</p> <p>"I could not find these in SMP as being assigned to any OU."</p>	<p>The purpose of identifying and separating SWMUs and WAGs into operable units is primarily for work that will be done in the future or that currently is on-going. This has little to do with five-year reviews. The inclusion of particular units in this five-year review can be easily explained. (1) The institutional controls for surface water address the entire SWOU, not a specific WAG or SWMU; therefore, it is only appropriate that they be included in the SWOU Five-Year Review. (2) The scrapyards may exist over SWMUs (assigned to the Burial Grounds Operable Unit), but the scrapyards themselves are not SWMUs. However, the action taken addressed surface-water contamination caused by the scrapyards and should be included in the SWOU Five-Year Review. (3) The NSDD is SWMUs 58 and 59; these are identified in the SMP as part of the SWOU. (4) The commentor is correct that the SMP does not list SWMU 8 as part of the SWOU; however, the WBS Surface-Water Assessments, 1.12.04.01.01.04, include SWMU 8. Later revisions to the SMP likely will reflect this.</p>

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Comment Number	Sect. Page/Para.	Reviewer and Comment	Response
1. (Cont.)		<p>"This will pull the 5-Year ROD review schedule forward for SS. It was assumed that it was being driven by WAG 23.</p> <p>"Definitely need to leave this [SWMU 8] in SWOU."</p>	<p>The SWMU 100 Five-Year Review has been incorporated into the SWOU Five-Year Review to prevent triggering the Surface Soils Operable Unit.</p> <p>Agree. The SWMU 8 action was designed to address surface-water contamination and should stay in the SWOU.</p>
2.	Page 3; Figure 1	<p>Bechtel Jacobs Company LLC/P. A. Gourieux [as transcribed by Debora Jolly]:</p> <p>"Make larger (fold out). SWMU 8 not listed - related to earlier comment that I could not find WAGs 1&7 assigned to an OU."</p>	<p>Agree. The figure has been enlarged. Please see response to Comment # 1 regarding SWMUs addressed by the Five-Year Review.</p>
3.	Sect. 5.1; Page 4; Para. 2	<p>Bechtel Jacobs Company LLC/P. A. Gourieux [as transcribed by Debora Jolly]:</p> <p>"Sentence 1 -?? Was [th]is an objective - If so, how is it being met?"</p>	<p>Agree. The text has been modified to indicate that this is KPDES monitoring, not a separate monitoring activity.</p>
4.	Sect. 5.2; Page 4; Para. 1	<p>Bechtel Jacobs Company LLC/P. A. Gourieux [as transcribed by Debora Jolly]:</p> <p>"Delete '...effectively the uranium and...' These fences cannot filter dissolve U - only that found by silt."</p>	<p>Agree in part. Text has been modified to indicate solid UF₄.</p>

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5.	Sect. 5.2; Page 7; Para. 1; Bullet 1	Bechtel Jacobs Company LLC/P. A. Gourieux [as transcribed by Debora Jolly]: "Delete '...uranium and...'"	Agree in part. Text modified to indicate solid UF ₄ .
6.	Sect. 5.2; Page 7; Para. 5	Bechtel Jacobs Company LLC/P. A. Gourieux [as transcribed by Debora Jolly]: "Reword - have they decreased? If so, that is more positive (general downward trend from plot)."	Agree. A decreasing linear trend has been indicated in the text.
7.	Sect. 8; Page 9	Bechtel Jacobs Company LLC/P. A. Gourieux [as transcribed by Debora Jolly]: "March 2004 - Appears to be 4 yrs. Instead of 5."	Disagree. The 2004 date is correct. The NSDD review was delayed when it was decided to combine the reviews by operable unit. However, EPA guidance (OSWER Dir 9355.7-02A) specifies that if a review occurs late, the next five-year review should occur five years from the date the preceding five-year review should have been conducted.
8.	Sect. 9; Page 9; Para. 1	Bechtel Jacobs Company LLC/P. A. Gourieux [as transcribed by Debora Jolly]: "'...surface-water and sediment sampling...' See previous comment under ICM section."	Agree. Text has been modified to clarify that this is part of the KPDES monitoring program.

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9.	Sect. 9; Page 9; Para. 1	Bechtel Jacobs Company LLC/P. A. Gourieux [as transcribed by Debora Jolly]: "'...uranium and...' Can't claim all U has been contained!"	Agree. The text has been modified to indicate "solid UF ₄ and uranium contaminated...."
10.	Appendix A; Cover page	Bechtel Jacobs Company LLC/P. A. Gourieux [as transcribed by Debora Jolly]: "'DRAFT' Remember to take this off."	Agree.
11.	Appendix A; Sect. 3.2.1; Page A-4; Para. 1	Bechtel Jacobs Company LLC/P. A. Gourieux [as transcribed by Debora Jolly]: "I thought they were intermittent and not as often as this."	Agree. The text has been modified to clarify this discussion and to indicate that this is an ongoing process.
12.	Appendix A; Sect. 3.2.1; Page 2; Para. 2	Bechtel Jacobs Company LLC/P. A. Gourieux [as transcribed by Debora Jolly]: "The level of info. for this system is greater than for the previous ICM discussions. This will probably generate a request from the regulators for more info. on the others."	Agree. The ICM discussions have been revised to reflect the NSDD and SWMU 8 formats.
13.	Appendix A; Sect. 3.2.1; Page A-6; Para. 4	Bechtel Jacobs Company LLC/P. A. Gourieux [as transcribed by Debora Jolly]: "Sentence 1 - Insert USEC before 'Environmental compliance....'"	Agree.

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14.	Appendix A; Sect. 3.4; Page A-7; Para. 3	Bechtel Jacobs Company LLC/P. A. Gourieux [as transcribed by Debora Jolly]: "This statement could be read to say any level is OK since it wasn't discharged in the NSDD. No mention that we have USEC commitment to meet target treatment goal."	Agree. This discussion has been significantly revised and has been approved by representatives of DOE and Bechtel Jacobs Company.
15.	Appendix B; Cover page	Bechtel Jacobs Company LLC/P. A. Gourieux [as transcribed by Debora Jolly]: "'DRAFT' Remember to take this off."	Agree.
16.	Appendix B; Sect. 3.1.5; Page B-6	Bechtel Jacobs Company LLC/P. A. Gourieux [as transcribed by Debora Jolly]: "What does it restrict? GW use/residential development?"	Agree. According to the ROD, a deed notice and restriction was placed in the chain of title to the deed of the property to inform potential buyers and/or users of the potential risks to human health and the environment posed by the leachate seeps; also included are the controls implemented at the site to minimize potential exposure. The text has been modified to include this information.

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17.	Appendix B; Sect. 3.1.6; Page B-6	Bechtel Jacobs Company LLC/P. A. Gourieux [as transcribed by Debora Jolly]: "Reword sentence 2 as follows - 'The costs associated specifically with SWMU 8 activities are small and are not accounted for separately since they are performed as part of plant wide, long-term surveillance and maintenance program and....'"	Agree. The text has been modified to appear sufficiently similar to that suggested.
18.	Sect. 2; Page 1; Para. 2	Bechtel Jacobs Company LLC/D. R. Jolly: "What point is this paragraph trying to make. To what 'previous remedial strategy' are you referring? You say DOE is conducting the review '...within five years of the initiation of the first remedial actions taken....' Define what that is for this review. Why the NSDD and not the ICMs? Since IRAs do not require five-year reviews, why are we doing on at all? If we committed to it in the ROD, then state this."	Agree. The Executive Summary has been modified to explain the reasoning for performing the Five-Year Review of the SWOU.
19.	Sect. 2; Page 1; Para. 3	Bechtel Jacobs Company LLC/D. R. Jolly: "'...are being met based, in part,' What is the basis for the rest of the review if existing monitoring information is only part?"	Agree. The text has been revised to indicate that Type Ia reviews are for interim remedies and that the review is limited in scope. The main purpose of the review is to determine whether the action is serving the protective purpose for which the remedy was intended. Since this is accomplished several ways, the reference to monitoring information has been deleted.

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20.	Page 3; Figure 1	Bechtel Jacobs Company LLC/D. R. Jolly: "Improve legibility by increasing size or print font. No Point in including if it is this difficult to read. Also, I suggest including a table that shows the SWMUs and their designations (names)."	Agree. The figure has been enlarged and a table has been added to identify the SWMUs.
21.	Sect. 5; Page 4; Para. 1	Bechtel Jacobs Company LLC/D. R. Jolly: "Last sentence. Again, if ICMs do not trigger reviews, what is the trigger. If you address adequately in response to Comment # 1, no need to repeat here."	Agree. The document indicates that the NSDD is the trigger. The Executive Summary has been revised to explain the reasoning.
22.	Sect. 5.1; Page 4; Para. 2	Bechtel Jacobs Company LLC/D. R. Jolly: "Who does the 'monitoring water and sediments for contamination' reference? It is not part of S&M activities that I have responsibility for. Specify what program addresses this."	Agree. The text has been revised to indicate that this is part of the KPDES program.
23.	Sect. 5.1; Page 4; Paras. 3 and 4	Bechtel Jacobs Company LLC/D. R. Jolly: "O&M requires monthly inspections which we do. I see no mention of these, or of any review of the results. Please emphasize that we have a program established and funded through Long Term S&M to ensure the inspections and necessary repairs are completed. Signs have been replaced and continue to be replaced as they become illegible. Paragraph 4 is somewhat repetitive."	Agree, text has been modified.

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24.	Sect. 5.2; Page 7; Para. 3	Bechtel Jacobs Company LLC/D. R. Jolly: "Again, there is no mention of the monthly inspections of any review of those reports. Please give credit for the established program as mentioned in Comment # 6 [<i>now Comment 23</i>]."	Agree, text has been modified.
25.	Sect. 8; Page 9	Bechtel Jacobs Company LLC/D. R. Jolly: "Why is the next 5-year review date not triggered off the date of this review. It would appear we have shortened the cycle by a year."	Disagree. The 2004 date is correct. The NSDD review was delayed when it was decided to combine the reviews by operable unit. However, EPA guidance (OSWER Dir 9355.7-02A) specifies that if a review occurs late, the next five-year review should occur five years from the date the preceding five-year review should have been conducted.
26.	Appendix A; Page A-1; Para. 2;	Bechtel Jacobs Company LLC/D. R. Jolly: "It has been my understanding that no 5-year review is required by EPA for IRAs. If we have committed to doing a 5-year review in the ROD, specify. This clarification should go hand-in-hand with that requested in Comment # 1 [<i>now Comment 18</i>]."	Partially agree. Type Ia reviews are specifically designed for IRAs (i.e., sites where remediation is ongoing). However, the text has been modified to include both EPA guidance-suggested language and whether the ROD specified that the DOE would perform a five-year review.
27.	Appendix A; Page A-2; Figure A-1	Bechtel Jacobs Company LLC/D. R. Jolly: "Label Little Bayou Creek since it is discussed in the text."	Agree. The figure has been modified.

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28.	Appendix A; Sect. 3.3; Page A-7; Table A-1; Sect. 3.4	Bechtel Jacobs Company LLC/D. R. Jolly: "Need to address the increase shown in the October and December releases. Why? Why is it acceptable? What activities were underway with USEC that caused the increase? What was done to make this ALARA? What is the existing agreement between DOE and USEC. Discuss USEC ownership and operation, DOE resin support."	Agree. This discussion has been significantly revised.
29.	Appendix A; Sect. 4; Page A-8; Para. 2	Bechtel Jacobs Company LLC/D. R. Jolly: "Where are these wetlands? Can we show them on a map?"	Agree. A map indicating the location of the wetlands has been added to the document.
30.	Appendix B; Sect. 1; Page B-1; Para. 1	Bechtel Jacobs Company LLC/D. R. Jolly: "Add to the last sentence a reference to the FFA requirement for 'synchronization' of the five-year review process."	Agree. This information has been added to the executive summary.
31.	Appendix B; Page B-2; Para. 2	Bechtel Jacobs Company LLC/D. R. Jolly: "Note '19989' should be '1998.'"	Agree.
32.	Appendix B; Page B-3; Figure B-1	Bechtel Jacobs Company LLC/D. R. Jolly: "What is the object in the lower left hand corner that shows fencing? If it has anything to do with WAGs 1&7, then specify. If it does not, consider removing from sketch."	Agree, figure has been revised.

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33.	Appendix B; Sect. 3.1.3; Page B-6	Bechtel Jacobs Company LLC/D. R. Jolly: "Why did we include this level of detail here, but not for the institutional controls? I think readers will wonder at the inconsistency."	The format for the ICMs has been modified to reflect the discussions of the NSDD and SWMU 8. However, please note that these actions were more limited in scope and the reviews, therefore, are more limited in scope.
34.	Appendix B; Sect. 3.1.6; Page B-6	Bechtel Jacobs Company LLC/D. R. Jolly: "Yes, there are costs associated specifically with SWMU 8! All you had to do was ask. I can give you cost for mowing cap and an approximate cost for inspections. Corrective maintenance is dependent on need. Why has cost not been addressed in any other part of this five-year review? Do we need to? It looks inconsistent."	Agree. Please see Comment # 17 for the language incorporated into the document.
35.	General	Bechtel Jacobs Company/Craig Jones : "Excellent job on covering NEPA requirements in this document, especially in the appendices. I have one minor comment. On page A-10, last paragraph of Section 5, change 'the action still qualifies for a categorical exclusion' to 'this five-year review concludes that NEPA values have been appropriately incorporated as required by DOE's Secretarial Policy on NEPA.' You might also consider adding a reference for the 1994 Policy both here and in App. B (this was issued June 13, 1994 by Hazel O'Leary as, 'Memorandum for Secretarial Officers and Heads of Field Elements, Subject: National Environmental Policy Act Policy Statement')."	(1) Thank you for the compliment. (2) Agree that text will be modified as suggested at Page A-10. (3) Agree. Secretarial Policy reference has been added.

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36.	Sect. 3; Page 2; Para. 3	Bechtel Jacobs Company LLC/Craig Rightmire: "Should we not somewhere state how individual sources or release sites are tied to a particular OU or should the reader know this?"	Agree. The text has been modified.
37.	Sect. 4; Page 2; Para. 1	Bechtel Jacobs Company LLC/Craig Rightmire: "Are all outfalls from ditches KPDES outfalls and, if so, should this not be noted?"	Agree. Text has been revised to clarify that all PGDP effluent passes through a KPDES compliance point.
38.	Figure 1	Bechtel Jacobs Company LLC/Craig Rightmire: "Consider including a table to tie SWMU number presented here to some descriptive site name."	Agree. A table with the information requested has been added to document.
39.	Sect. 5.2; Page 7; Para. 5	Bechtel Jacobs Company LLC/Craig Rightmire: "Is the uranium reported Total Uranium and is it from filtered or unfiltered samples?"	Agree. Text has been revised to indicate form of uranium (i.e., solid UF ₄). Samples are unfiltered.

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40.	Section 3.3; Page A-7	<p>United States Department of Energy (DOE)/Rachael Blumenfeld:</p> <p>"Monitoring Information, Paragraph 5 (Immediately below Table A-1). Radioactivity discharged in water IS NOT regulated under a KPDES Permit - the Clean Water Act is very clear in that it does not give either the State nor EPA the authority to regulate us in this matter. DOE voluntarily offers the State of Kentucky information regarding Radioactivity discharged in water. Therefore, the statement: 'These levels of ⁹⁹Tc have not resulted in an exceedance of the permitted standards for Outfall 008' [added emphasis] is also incorrect. Please revise these two sentences to reflect the fact that DOE self-regulates the discharge of ⁹⁹Tc and offers this information in a volunteering basis to the state and EPA."</p>	<p>The text has been modified to reflect that DOE is self-regulating with regard to radionuclides. References to the KPDES permit associated to radionuclides has been deleted. However, the discharges are not meeting the target treatment goals specified in the ROD. Language has been significantly revised to address this issue.</p>
41.	Section 3.4; Remedial Objectives; Page A-8; Para. 1; Last Sentence	<p>DOE/Rachael Blumenfeld:</p> <p>"Similar to previous comment. Neither the State of Kentucky nor the EPA regulates DOE when it comes to Radioactive discharges in water, according to the CWA. Therefore, there could not be a compliance/non-compliance, exceedance/non-exceedance issue regarding ⁹⁹Tc discharge into the NSDD. Please revise sentence to reflect the fact of DOE self-regulation regarding ⁹⁹Tc discharge and the offering of this information, voluntarily, to both the state and EPA."</p>	<p>The text has been modified to reflect that DOE is self-regulating with regard to radionuclides. References to the KPDES permit associated to radionuclides has been deleted. However, the discharges are not meeting the target treatment goals specified in the ROD. Language has been significantly revised to address this issue.</p>

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Comment Number	Sect. Page/Para.	Reviewer and Comment	Response
42.	General	<p>DOE/Raul Castaneda:</p> <p>"Although you clarify that Type Ia reviews do not include interviews, evaluations of applicable or relevant and appropriate requirements, or site visits/inspection, you mention you had gone ahead and conducted those activities for a more thorough review. However, you are not being consistent: the main document mentions the interviews and the visits/inspections conducted by BJ and Jacobs EM Team, but it does not have a separate section where they are discussed - as it was done for the NSDD and, to a lesser degree, for the SWMU 8 of WAG 1 and 7. Is there any reason for this different treatment?"</p>	Agree. Information on the ICMs has been expanded.
43.	Section 2; Purpose of Report; Page 1; Paragraph 2	<p>DOE/Raul Castaneda:</p> <p>"Add the word 'action' to the following statement: 'within five years of the initiation of the first remedial action within a designated OU.'"</p>	Agree.
44.	Section 4; Description of the Surface Water Operable Unit; Page 2	<p>DOE/Raul Castaneda:</p> <p>"I feel that we need to include a list of the SWMUs we are making reference to in this section. Figure 1, SWMUs Assigned to the SWOU at PGDP, is pertinent does tell the reviewers where the SWMUs are located but it does not tell the titles. Please include a list of the SWMUs associated with this OU."</p>	Agree. A table has been added to accompany Figure 1.

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45.	Section 5.2; Scrap Yard Silt Fence; Page 7; Para. 3	DOE/Raul Castaneda: "You mention that an interview with a BJC's representative was conducted; however, you do not mention what the outcome of that interview was. Appendix A and B both have a section dedicated to interviews and visits/inspections - why the difference here?"	Agree. A section expanding the interview has been added.
46.	Section 9; Statement of Protectiveness; Page 9; Para. 1; Sentence 2	DOE/Raul Castaneda: "Please change this sentence to read as follows: 'Since the action is an ICM, the objectives of the action are limited in scope and aim at reducing the potential for direct contact with the contaminated surface-water areas.'"	Agree.
47.	Section 2.3; Record of Decision; Page A-4; Para. 4	DOE/Raul Castaneda: "Please change the following sentence from 'holding informal meeting to specific groups...' to 'holding informal meetings with specific groups...'"	Agree.
48.	Section 2.3; Record of Decision; Page A-4; Para. 4.	DOE/Raul Castaneda: "Please change the following sentence from 'No comments were received... organization opposed to the...' to 'No comments were received... organization opposing the interim correction action.'"	Agree.

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49.	Section 7.2.1; State Contacts; Page A-11; Para. 2.	DOE/Raul Castaneda: "Change first sentence to read as follows: 'The Agreement in Principle (AIP) provides on-site staff for state oversight of environmental management activities performed by DOE at the PGDP.'"	Agree.